



July 2, 2015

Oregon Department of Environmental Quality
Northwest Region Portland Office
Attn: Mr. Scott Manzano
700 NE Multnomah Street
Portland, Oregon 97232

Dear Scott,

This is a response to the RI/SCE Addendum (addendum) compiled by DEQ and transmitted to StarLink on April 16, 2015. It is our understanding that this addendum completes the RI/SCE. StarLink understands that this will allow the completion of the feasibility study.

The addendum contains additional observations but no new data. The work and analyses completed by StarLink incorporated more data, analyzed sampling results 3-dimensionally and applied current scientific approaches. The DEQ observations in the addendum are more in the nature of conclusions, with limited or no data to support them. The DEQ conclusions in the addendum were all previously considered during StarLink's analyses and most are already included in the RI record or were previously discussed with DEQ.

The addendum also indicates that DEQ may request that StarLink conduct new investigations and obtain additional data without establishing the need or justification for the requests. StarLink has repeatedly agreed to and complied with all previous DEQ requests. StarLink, however, will not agree to perform work when the request for the work is based on incomplete data or **analysis**, unsupported assumptions or obsolete methodology, especially in this case, where there is a vast amount of historical and technical information about conditions in the area. An abbreviated review cannot adequately characterize a site as complex as the former Rhone Poulenc site, particularly if all available information has not been reviewed.

Data for the site has been collected over the last 30 years and is contained in numerous documents. StarLink understands the considerable effort necessary to review all the available information and to accurately evaluate site conditions. However, DEQ has not provided data or analysis to support many of the statements in the addendum. Without the supporting data or analysis StarLink has no basis to evaluate DEQ's alternate conclusions and apparent rejection of analyses that StarLink has previously provided to DEQ.

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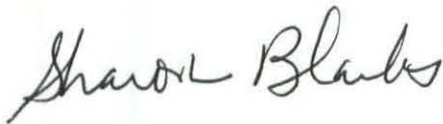
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StarLink will provide clarifications to correct certain factual inaccuracies because documents were omitted or apparently not considered. Specifically:

1. Physical conditions are described without referencing supporting facts.
2. Factual misstatements are made as a result of inaccurate paraphrased from the RI, SS8 or supplemental submittals.
3. Obsolete or incorrect analyses were used.
4. Many documents that were included in this addendum are edited and incomplete. The addendum and reference section are an incomplete compilation of all the work that has occurred since StarLink submitted the RI in 2010.

These factual corrections will not prevent DEQ and StarLink from moving forward with the FS process. StarLink would like to continue with the feasibility work previously started and submitted to DEQ.

Very Truly Yours,
Quantum Management Group



pp: Joan Underwood
Project Manager

c: Stuart Dearden, Sanofi USA
Jim Benedict, Cable Huston
Keith Johnson, DEQ
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